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Examiner Paul H. Nguyen-Ba
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FROM: Gero G. McClellan / Jon K. Stewart/pdm
PAGE(S) with cover: 14

RE:
TITLE: METHOD AND SYSTEM FOR ASCERTAINING CODE SETS ASSOCIATED
WITH REQUESTS AND RESPONSES IN MULTI-LINGUAL DISTRIBUTED
ENVIRONMENTS

U.S. SERIAL NO.: 09/904,734
FILING DATE: July 13, 2001
INVENTOR(S): Banerjee et al.
EXAMINER: Paul H. Nguyen-Ba
GROUP ART UNIT: 2176
CONFIRMATION NO.: 3372

Attached for the above-referenced application please find:

1. REPLY BRIEF

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 Atty. Dkt. No. ROC920010101US1
 PS Ref. No.: IBMK10101

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

**In re Application of:
Banerjee et al.**

Serial No.: 09/904,734

Filed: July 13, 2001

**For: METHOD AND SYSTEM FOR
ASCERTAINING CODE SETS
ASSOCIATED WITH
REQUESTS AND RESPONSES
IN MULTI-LINGUAL
DISTRIBUTED
ENVIRONMENTS**

Group Art Unit: 2176

Confirmation No.: 3372

Examiner: Paul H. Nguyen-Ba

MAIL STOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

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August 16, 2006
Date

Jon K. Stewart

REPLY BRIEF

Dear Sir:

Applicants submit this Reply Brief to the Board of Patent Appeals and Interferences in response to the Examiner's Answer dated April 21, 2006. Please charge any additional fees that may be required to make this Reply Brief timely and acceptable to Deposit Account No. 09-0465/ROC920010101US1.

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Grounds of Rejection to be Reviewed on Appeal

The Examiner indicates in the Examiner's Answer dated June 16, 2006, that the following ground(s) of rejection are applicable to the appealed claims:

Claim Rejections - 35 U.S.C. § 103

1. Claims 1, 3-5, 7-9, 12-14, 16, 18-20 and 22-24 stand finally rejected under 35 U.S.C. § 103(a) as being unpatentable over *Veditz et al.*, U.S. Pat. No. 6,496,793 (hereinafter *Veditz*) in view of *Watanabe et al.*, U.S. Pat. No. 6,185,729 (hereinafter *Watanabe*).
2. Claims 2, 6, 10, 11, 17, 21, 26 and 27 stand finally rejected under 35 U.S.C. § 103(a) as being unpatentable over *Veditz* in view of *Watanabe*, and further in view of *Hom*, U.S. Patent Pub. No. 2002/0156688.
3. Claims 15 and 25 stand finally rejected under 35 U.S.C. § 103(a) as being unpatentable over *Veditz* in view of *Watanabe et al.*, U.S. Pat. No. 6,185,729 in further view of *Kan et al.*, U.S. Patent Pub. No. 2003/0088544.

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PS Ref. No.: IBMK10101**ARGUMENTS****THE EXAMINER ERRS IN REJECTING CLAIMS 1, 12, AND 16 UNDER
35 U.S.C. § 103(A) AS BEING OBVIOUS OVER VEDITZ (U.S. 6,496,793)
IN VIEW OF WATANABE (U.S. 6,185,729)**

The Examiner has taken the position that an illustration of "a language dependent file operation method"¹ that includes retrieving an embedded "Language Driver Identification" (LDID) from a file on disk discloses certain limitations recited by claims 1, 12, and 16. Namely, claim 1 recites a "method of determining an appropriate character set for use in client-server communications" that includes "determining whether the client request includes, as part of the network communication protocol, a request character set designation."² The Examiner contends:

As discussed in the rejection of independent claim 1, *Veditz* specifically teaches that a user may make a request for the retrieval of a data file (see Fig. 3A - 301 and col. 16 lines 49-67 et seq.). The *Veditz* system then determines whether the requested data file includes a language driver identification ("LDID") (i.e., "character set designation") (see Fig. 3A - 303 and col. 16 lines 49-67 et seq.).

Examiner's Answer, p. 12. On its face, the cited passage describes two steps of the "language dependent file operation method." First, a step of a user making a request: "a user may make a request for the retrieval of a data file."³ And second, a step of retrieving the embedded LDID from the requested data file. Although the examiner asserts that the "*Veditz* system then determines whether the requested data file includes [an LDID]"⁴, in fact, the passage cited by the Examiner describes that the system of *Veditz* first determines whether language driver checking has been enabled⁵ and if so "then at step 303 the language driver Identifier (LDID) in the data file is read."⁶ In any event, Applicants submit that *Veditz* is very clear that the LDID is an embedded part of the "requested data file."⁷

¹ *Veditz*, 4:18-20.

² Claim 1. See also claims 12 and 16.

³ *Examiner's Answer*, p. 12.

⁴ *Examiner's Answer*, p. 12.

⁵ Step 302 of the "language dependent file operation method" disclosed in *Veditz*, 16:49-54.

⁶ *Veditz*, 16:55-57.

⁷ See *Veditz*, 16:67-67 - 16:1-5.

The Examiner goes on to suggest: "Appellant's argument centers upon the lack of a description for the term "client" in the cited prior art of record."⁸ Respectfully, this mischaracterizes Appellants' position. Regardless of whether a "client" computer can contain its own applications that are run on its own machine (i.e., fat client) and does not necessitate a server for its application processing (i.e. thin client)⁹ as suggested by the Examiner, the Language driver ID is retrieved from "the requested data file." However, claims 1 and 16 expressly recite a step of "determining whether the client request includes, as part of the network communication protocol, a request character set designation, and if the client request does not include the request character set designation: (i) retrieving locale information contained in the client request"¹⁰ In other words, the claims 1 and 16 recite determining whether a request expressly includes one element: a "request character set," and if the client request does not include this element, retrieving "locale information" also from the client request. Thus, the comparison between an "LDID" stored in "the requested data file" and a client request that may include "as part of the network communication protocol, a request character set designation" is fundamentally flawed because *Veditz* teaches to retrieve information embedded within "the requested data file, where the claims recite, determining information from the request itself.

On this point, the Examiner argues that:

locale information is present on both the "active LDID" which the user's system currently operates under (i.e., during the current session) and the "LDID" of the data file (see col. 3 lines 23-54). In Fig. 3A - 301 and 303 of *Veditz*, a data file is requested by a client from its own database applications and the LDID in the data file is read (see also col. 16 lines 49-57). Furthermore, a "local LDID" may be set to the value of an "active LDID" after a comparison of the two language drivers (see col. 18 lines 10-26). Appellant's argument seems to center upon the lack of a description for the term "retrieved". However, *Veditz* clearly teaches that the LDID files are requested for and read by the National LanguageSupport system of *Veditz*. In order for a data file to be accessed, read, or compared, the data file must have been retrieved.

⁸ Examiner's Answer, p. 12.

⁹ Examiner's Answer, p. 12.

¹⁰ Claim 1, Claim 16 also recites this limitation.

Examiner's Answer, p. 13. The Examiner's assertion that "Appellant's argument seems to center upon the lack of a description for the term 'retrieved'" unfairly simplifies Appellant's position. It is not merely the lack of a single word "retrieved" from *Veditz*, rather, it is what information is retrieved from where. Again, as the Examiner understands, *Veditz* discloses that "a data file is requested by a client from its own database applications and the LDID in the data file is read."¹¹ The LDID is read from the requested data file, where the claims recite determining a character set designation directly from the request or from locale information included in the request. In either case, the response character set designation may be fully determined using the request itself, without any regard to information embedded in "the requested data file" as described in *Veditz*.

Regarding independent claim 12, the Examiner cites the same passages discussed above to support the rejection of this claim. Accordingly, for all these reasons Applicants respectfully submit, therefore, that *Veditz* in view of *Watanabe* fails to disclose the limitation recited by claim 12 of a computer program configured to "determine if a request header composed according to a network communications protocol received with a client request from the at least one client computer designates a character set; and if the request header does not designate the character set: (i) retrieve locale information from the client request..."

Further, independent claim 12 recites the step of determining from "a request header composed according to a network communications protocol received with a client request from the at least one client computer designates a character set." Comparing this with the limitation of claims 1 and 16, the limitation of claim 12 is more narrow because it specifies determining whether the "character set designation" is included in a "request header composed according to a network communications protocol", where claims 1 and 16 only recite determining whether the request itself includes a character set designation. Thus, reliance on *Veditz* regarding claim 12 is even less tenable. Specifically, *Veditz* lacks any description of a "request header composed according to a network communication protocol," and instead describes an

¹¹ *Examiner's Answer*, p. 13
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"LDID" being retrieved from "a requested data file." Accordingly, claim 12 is believed to be allowable, and allowance of this claim is respectfully requested.

Claims 3-5, 7-9, 13-14, 18-20 and 22-24 each depends from one of independent claims 1, 12, and 16 and, therefore, are believed to be allowable.

Claims 2, 6, 10, 11, 17, 21, 26 and 27 stand finally rejected under 35 U.S.C. § 103(a) as being unpatentable over *Veditz* in view of *Watanabe*, and further in view of *Hom*. Each of these claims depends from one of independent claims 1, 12, and 16. Applicants respectfully submit, for all the reasons given above, that claims 1, 12, and 16 are allowable, and therefore, that claims 2, 6, 10, 11, 17, 21, 26 and 27 are also allowable.

Claims 15 and 25 stand finally rejected under 35 U.S.C. § 103(a) as being unpatentable over *Veditz* in view of *Watanabe*, and further in view of *Kan*, U.S. Patent Pub. No..2003/0088544. Claims 15 and 25 depend from claims 12 and 16, respectively. Applicants respectfully submit that claims 12 and 16 are allowable, and therefore, that claims 15 and 25 are also allowable.

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CONCLUSION

The Examiner errs in finding that:

- Claims 1, 3-5, 7-9, 12-14, 16, 18-20 and 22-24 are unpatentable over *Veditz* in view of *Watanabe*.
- Claims 2, 6, 10, 11, 17, 21, 26 and 27 are unpatentable over *Veditz* in view of *Watanabe*, and further in view of *Horn*.
- Claims 15 and 25 are unpatentable over *Veditz* in view of *Watanabe*, in further view of *Kan*.

Withdrawal of the rejection and allowance of all claims is respectfully requested.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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CLAIMS APPENDIX

(Previously Presented) A method of determining an appropriate character set for use in client-server communications, comprising at least one of:

(a) selecting a character set for a client request made by client to a server using a network communication protocol, the selecting comprising:

determining whether the client request includes, as part of the network communication protocol, a request character set designation; and
if the client request does not include the request character set designation:

(i) retrieving locale information contained in the client request; and

(ii) associating the locale information with the request character set designation using mapping data located on the server; and

(b) selecting a response character set for a response from the server to the client, the selecting comprising:

determining whether the server response includes a response character set designation; and

if the server response does not include the response character set designation:

(i) retrieving locale information contained in the server response; and

(ii) associating the locale information contained in the server response with the response character set designation using the mapping data.

2. (Previously Presented) The method of claim 1, wherein the network communications protocol used to make the client request and the server response comprises the hypertext transfer protocol (HTTP).

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3. (Original) The method of claim 1, wherein associating comprises accessing a character set lookup table that maps the locale information to the request character set designation and response request character set designation, respectively.
4. (Original) The method of claim 1, further comprising associating the request character set designation with a code-set converter designation by accessing a converter lookup table which maps the code-set converter designation with the request character set designation.
5. (Original) The method of claim 1, wherein the locale information contains a cultural language preference identifier.
6. (Original) The method of claim 1, wherein the character set designations contain an IANA character set parameter.
7. (Original) The method of claim 1, further comprising associating the request character set designation with a code-set converter designation.
8. (Original) The method of claim 7, wherein the code-set converter designation is contained in a lookup table and is mapped with response character set designation.
9. (Original) The method of claim 7, wherein the code-set converter designation is indicative of user specific implementations of character sets.
10. (Original) The method of claim 1, further comprising converting the client request into Unicode characters.
11. (Original) The method of claim 10, further comprising converting the response from Unicode characters to the character set associated with the locale information.

12. (Previously Presented) A server computer system connected to at least one client computer, the server computer system comprising a memory containing a code-set program and at least one processor, wherein the processor, when executing the code-set program, is configured to:

determine if a request header composed according to a network communications protocol received with a client request from the at least one client computer designates a character set; and

if the request header does not designate the character set:

- (i) retrieve locale information from the client request; and
- (ii) associate the locale information with a character set.

13. (Original) The system of claim 12, wherein the processor is further configured to associate the character set with a code-set converter.

14. (Original) The system of claim 12, wherein the locale information contains a language identifier.

15. (Original) The system of claim 12, wherein the code-set converter is a JVM code-set converter.

16. (Previously Presented) A computer readable medium containing at least a code-set program which, when executed by a server computer, performs operations comprising at least one of:

(a) selecting a character set for a client request made by client computer to a server computer using a network communication protocol, the selecting comprising:

determining whether the client request includes, as part of the network communication protocol, a request character set designation, and
if the client request does not include the request character set designation:

- (i) retrieving locale information contained in the client request; and

- (ii) associating the locale information with the request character set designation using mapping data located on the server; and
- (b) selecting a response character set for a server response from the server to the client, the selecting comprising:
 - determining whether the server response includes a response character set designation; and
 - if the server response does not include the response character set designation:
 - (i) retrieving locale information contained in the server response; and
 - (ii) associating the locale information contained in the server response with the response character set designation using the mapping data.

17. (Previously Presented) The method of claim 1, wherein the network communications protocol used to make the client request and the server response comprises the hypertext transfer protocol (HTTP).

18. (Original) The computer readable medium of claim 16, wherein associating comprises accessing a character set lookup table that maps the locale information to the request character set designation and response request character set designation, respectively.

19. (Original) The computer readable medium of claim 16, further comprising associating the request character set designation with a code-set converter designation by accessing a converter lookup table which maps the code-set converter designation with the request character set designation.

20. (Original) The computer readable medium of claim 16, wherein the locale information contains a cultural language preference identifier.

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21. (Original) The computer readable medium of claim 16, wherein the character set designations contain an IANA character set parameter.
22. (Original) The computer readable medium of claim 16, further comprising associating the request character set designation with a code-set converter designation.
23. (Original) The computer readable medium of claim 22, wherein the code-set converter designation is contained in a lookup table and is mapped with response character set designation.
24. (Original) The computer readable medium of claim 22, wherein the code-set converter designation is indicative of user specific implementations of character sets.
25. (Original) The computer readable medium of claim 24, wherein the code-set converter designation is contained in a Java Virtual Machine (JVM) code-set converter.
26. (Original) The computer readable medium of claim 16, further comprising converting the client request into Unicode characters.
27. (Original) The computer readable medium of claim 26, further comprising converting the response from Unicode characters to the character set associated with the locale information.